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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

SAN DIEGO GAS AND ELECTRIC
COMPANY,

Plaintiff,

vs.

LAMORAK INSURANCE COMPANY
f/k/a THE NORTHERN ASSURANCE
COMPANY OF AMERICA, as
successor in interest to EMPLOYERS'
SURPLUS LINES INSURANCE
COMPANY; THE CONTINENTAL
INSURANCE COMPANY, as successor
in interest to HARBOR INSURANCE
COMPANY; ASSOCIATED
ELECTRIC & GAS INSURANCE
SERVICES LIMITED;

Defendants.

AND RELATED CROSS-CLAIMS

Case No. 3:15-cv-00636-WQH-JLB

Hon. William Q. Hayes

JOINT MOTION FOR DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and the Court's April 28, 2016, Order (Dkt. No. 84), San Diego Gas & Electric Company, Lamorak Insurance Company, The Continental Insurance Company, and Associated Electric & Gas Insurance Services Limited request that all claims, cross-claims, and counter-claims in this lawsuit be dismissed with prejudice, with each party bearing its own attorneys' fees and costs.

Dated: July 14, 2016

LINER LLP

By: /s/ Fiona A. Chaney
Fiona A. Chaney
Attorneys for San Diego Gas and Electric
Company

Dated: July 14, 2016

EDISON, McDOWELL & HETHERINGTON
LLP

By: /s/ Raymond J. Tittmann
Raymond J. Tittmann
Attorneys Lamorak Insurance Company
f/k/a/ The Northern Assurance Company as
successor in interest to Employers Surplus
Lines Insurance Company and The
Continental Insurance Company as
successor in interest to Harbor Insurance
Company

Dated: July 14, 2016

RIVKIN RADLER LLP

Bv: /s/ John L. Rivkin
John L. Rivkin
Attorneys for Associated Electric & Gas
Insurance Services Limited

CERTIFICATE OF SERVICE

*San Diego Gas and Electric Company v. Lamorak Insurance Company f/k/a
The Northern Assurance Company of America, et al.*
USDC Case No. 15-cv-0636 WQH-JLB

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the action. My business address is 1100 Glendon Avenue, 14th Floor, Los Angeles, CA 90024-3503. On July 14, 2016, I filed and served these document(s):

JOINT MOTION FOR DISMISSAL

[SEE ATTACHED SERVICE LIST]

☒ **BY THE COURT'S CM/ECF SYSTEM:** I electronically filed the document(s) using the CM/ECF system, which sent notification of the filing to the person(s) listed on the attached service list.

☒ [Federal] I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 14, 2016, at Los Angeles, California.

/s/ Fiona A. Chaney
Fiona Chaney

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SERVICE LIST

*San Diego Gas and Electric Company v. Lamorak Insurance Company f/k/a
The Northern Assurance Company of America, et al.*
USDC Case No. 15-cv-0636 WQH-JLB

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